

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**LARHONDA BIGGLES, as
ADMINISTRATRIX OF THE
ESTATE OF JAQUAREE
SIMMONS,
Plaintiff,**

v.

**HARRIS COUNTY, TEXAS, *et. al*,
Defendants.**

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Civil Action No.: 4:22-cv-3326

**JOINT MOTION FOR ENTRY OF
CONFIDENTIALITY AND PROTECTIVE ORDER**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff LARHONDA BIGGLES, as Administratrix of the Estate of Jaquaree Simmons, and Defendant HARRIS COUNTY (collectively “the Parties”) agree that discovery sought in this action may require the disclosure of certain confidential information, documents, and material. Accordingly, the Parties have agreed to the terms to be used to govern the designation and protection of such information and documents. *See* attached the proposed Agreed Confidentiality and Protective Order marked as Exhibit “1.” The Parties respectfully request the Court to sign and enter the Agreed Confidentiality and Protective Order [Ex. #1] submitted with this motion.

(signatures follow on next page)

Respectfully submitted,

Date: Feb. 24, 2023.

By: /s/ John J. Coyle (with permission)
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Attorneys for Defendant Harris County

CERTIFICATE OF SERVICE

I certify that, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this Certificate is attached was duly served upon each party to this cause on the CM/ECF system, which will automatically serve a Notice of Electronic Filing on the following:

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